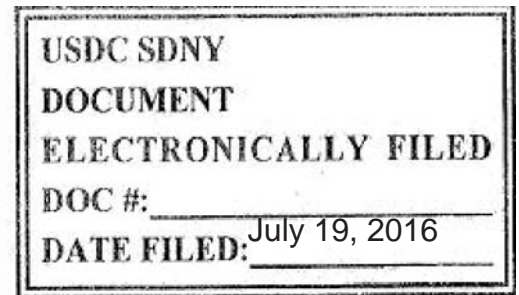


115 Broadway, Suite 1704  
New York, NY 10006  
212.264.9940  
Fax: 212.898.1187  
neil@checkmanlaw.com  
www.checkmanlaw.com  
www.whitecollarcrimesnyc.com

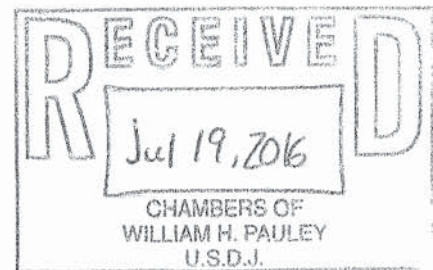
LAW OFFICES OF NEIL B. CHECKMAN, ESQ.

July 13, 2016



Hon. William H. Pauley  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: S.E.C. v. Devon D. Archer, et al.,**  
**16 Cv. 3505 (WHP)**



Dear Judge Pauley:

I am the attorney assigned pursuant to the Criminal Justice Act, to represent Michelle Morton on the parallel criminal action, 16 Cr. 371 (RA), now pending before Judge Abrams. As such, I am not appearing on Ms. Morton's behalf on the above-referenced S.E.C. action.

I write to request that this Court stay all proceedings, including the requirement that Ms. Morton answer the Complaint, which she must do on or before July 25, 2016, until the conclusion of the criminal action. It is counsel's understanding that the Government will file a motion with this Court to stay discovery and depositions until the criminal matter is resolved.

It is my understanding that Ms. Morton will have no objection to such a stay, but would be prejudiced at this point if she had to file an answer, pro se. It is counsel's further understanding that the other C.J.A. attorneys in the parallel criminal action would join in this application.

To be clear, counsel by making this application, is not appearing on Ms. Morton's behalf. Under the C.J.A., counsel is not authorized to make such an appearance. I write instead, in my capacity as Ms. Morton's attorney on the parallel criminal action, seeking this Court's guidance.

Hon. William H. Pauley  
July 13, 2016  
Page 2

I thank the Court for taking the time to consider this application.

Very truly yours,

A handwritten signature in cursive script, reading "Neil B. Checkman", followed by a horizontal line extending to the right.

Neil B. Checkman

/NBC

cc: Ms. Michelle Morton (By e-mail)  
Tejal D. Shah, Esq., for the S.E.C. (By e-mail)  
A.U.S.A.s Brian Blais and Amy Hector for the Government (By e-mail)  
All defense counsel on the criminal action (By e-mail)  
All defense counsel on the civil action (By e-mail)